Ozone NAAQS Designations: San Antonio Area

Purpose: Receive direction on appropriate ozone designation for counties in the San Antonio area. Options include:

1. Accept state recommendation for attainment (or unclassifiable)
2. Modify state recommendation to reflect nonattainment for:
    a. Bexar County, plus some surrounding counties (e.g., Comal and Guadalupe)
    b. Bexar County only
    c. Sub-county area of Bexar County

Timing:

Deliberative Process / Ex. 5

State Recommendation: In September 2017 and February 2018, the State submitted updated recommendations:

Deliberative Process / Ex. 5

Facts:

- Monitoring Data – Two of the three monitors with complete data in the area show violating DVs in 2016 and 2017 – see Figure 1.
- Emissions – The majority of the area's NOx and VOC emissions are in Bexar County – about 60%. Other counties in the CBSA with significant emissions are: Atascosa (14%), Comal (11%), and Guadalupe (7%).
- Meteorology – Ozone exceedances are associated with winds from the south and southeast – see Figure 2.
- Air Quality Modeling - Texas submitted air quality modeling which shows impacts on high ozone days of about 10 ppb from Bexar County, and 1 ppb (or less) from surrounding counties. While the modeling shows attainment in 2023, EPA has not historically considered future conditions in designating areas - the statutory language is written in the present tense and does not lend itself to an argument that it is appropriate to base the designation on a future prediction.
- Impact of Foreign Emissions - Back trajectories on ozone exceedance days suggest minimal contribution from Mexico. Texas' modeling shows in-state contributions of about 17-20 ppb, and Mexican contributions of only about 1 ppb.

Other Potential Controversial Areas: By **April 30, 2018**, we must issue final designations for all remaining areas. Over the next few weeks, we need to talk with you about several areas, including:

- Racine County, WI (part of Milwaukee MSA)
- Uinta Basin, UT
- Baton Rouge, LA

Figure 1. Location of Monitors in Bexar County

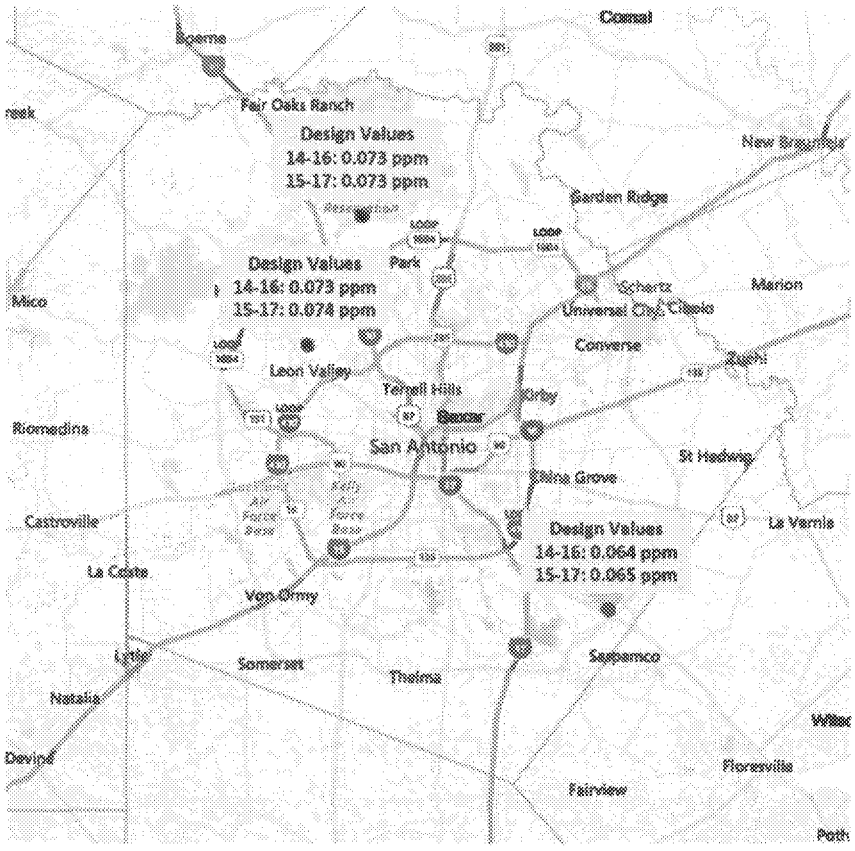

Figure 2. Back Trajectories on High Ozone Days